

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re : Chapter 9
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846
Debtor. : Hon. Steven W. Rhodes
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**RESPONSES OF INTERNATIONAL UNION, UAW
TO DEBTOR'S INTERROGATORIES**

International Union, UAW (“UAW”) hereby responds to the April 11, 2014 interrogatories of Debtor City of Detroit (“City”).

GENERAL OBJECTIONS

UAW objects to the interrogatories to the extent that they seek to elicit information that: (a) is protected from disclosure by the attorney-client privilege; (b) is protected from disclosure as attorneys’ work product; and/or (c) is not related to the subject matter of the proceeding. UAW also objects to the interrogatories to the extent they are overly broad or unduly burdensome. The responses below are made subject to these general objections.

RESPONSES TO INTERROGATORIES

Interrogatory No. 1: Identify any custodians of documents requested in the accompanying Requests for Production of Documents (served herewith).

Response to No. 1: Any responsive documents are in the custody, control or possession of the UAW.

Interrogatory No. 2: Identify and describe any research, studies, or analysis conducted by, requested, reviewed, or received by you or on your behalf regarding the Plan, or

any alternative to the Plan, that address issues such as, but not limited to, the City of Detroit's current financial health, projected financial health, taxes (wagering, property, income), the Detroit Institute of Arts ("DIA"), Detroit Water and Sewer Department ("DWSD"), Detroit's Public Lighting Authority ("PLA"), or the Restructuring and Reinvestment Initiatives outlined in the Plan.

Response to No. 2: See response to Request #1 to UAW's responses to the City's April 11, 2014 document requests to the UAW.

Interrogatory No. 3: Please indicate whether you have analyzed, or have any intention to challenge other creditors' claims and/or their recoveries if the Plan is confirmed.

Response to No. 3: UAW has to date performed no such analysis and has to date not decided whether it would assert any such challenge.

Interrogatory No. 4: Please identify a lead person or persons who have knowledge of your financial condition under different recovery levels and your financial condition in the event the Plan is not approved or is dismissed.

Response to No. 4: UAW objects to Interrogatory #4 on the ground its financial condition is not relevant to these proceedings and will not be directly affected by different recovery levels of creditors or by whether the Plan is not approved or is dismissed.

Interrogatory No. 5: Please indicate whether you have purchased or sold any claims against the City of Detroit and, if so, the price at which you purchased or sold those claims and the date(s) on which you purchased or sold those claims.

Response to No. 5: No.

Interrogatory No. 6: Please indicate whether you have had any communications with any foreign or domestic governmental regulators related to the City of Detroit bankruptcy, the Plan, or your City of Detroit debt holdings. If so, please also identify the person or persons most knowledge about these communications.

Response to No. 6: UAW objects to Interrogatory #6 as seeking information not relevant to the subject matter of the proceeding. In addition, UAW objects to this request as improperly chilling and interfering with UAW's First Amendment right to petition the government for redress of grievances. Without waiving these objections, UAW states that it has

had no communications with government regulators related to the City of Detroit bankruptcy, the Plan or any City of Detroit debt holdings.

Interrogatory No. 7: Please identify and describe any communications you have had (or that have occurred on your behalf) with any government entities (listed below) or officials, directors, agents, representatives, or employees thereof regarding the City of Detroit. This interrogatory includes, but is not limited to, any efforts to enact legislation concerning, or any effort to obtain funds for, the City of Detroit. This interrogatory covers the following governmental entities: The White House, any United States executive branch agencies or departments; the United States Congress; the Executive Office of the Governor of the State of Michigan; the State of Michigan Legislature; the City Council of the City of Detroit; and the Office of the Mayor of the City of Detroit.

Response to No. 7: UAW objects to Interrogatory #7 as overbroad and seeking information not relevant to the subject matter of this proceeding. In addition, UAW objects to this request as improperly chilling and interfering with UAW's First Amendment right to petition the government for redress of grievances.

Interrogatory No. 8: Please indicate whether you or some person or entity on your behalf has communicated with the U.S. Trustee regarding the Plan.

Response to No. 8: There has been no such communication.

Interrogatory No. 9: Please identify a lead person or persons who have knowledge of any research, studies, or analysis conducted by, requested, or received by you or on your behalf regarding the City of Detroit's future creditworthiness with or without Plan approval.

Response to No. 9: UAW has knowledge of such matters only to the extent it has reviewed research, studies or analysis conducted by the Retirees Committee and its professionals. UAW understands that the Retirees Committee asserts that such research, studies or analysis are protected from disclosure by the work product doctrine and by confidentiality agreement. UAW defers to the Retirees Committee in this regard and asserts such objections as are asserted by the Retirees Committee.

Interrogatory No. 10: Please indicate whether you have any common interest or joint defense agreements with any other City of Detroit creditors.

Response to No. 10: UAW has no formal common interest or joint defense agreements with any other City creditors. However, various parties that submitted objections to the City's eligibility for Chapter 9 bankruptcy and that participated in the trial and appeals related to such objections have asserted the existence of a common interest privilege with respect to the City's eligibility trial.

Interrogatory No. 11: Please identify any person or persons who have knowledge of debt limits or post-2006 assessments related to Limited Tax General Obligations.

Response to No. 11: UAW is unaware of any such person.

Interrogatory No. 12: Please identify and describe any notifications you have sent to any insurance carriers, including but not limited to potential/actual malpractice or breach of fiduciary duty claims since January 1, 2004.

Response to No. 12: UAW objects to Interrogatory #12 to the extent it refers to notifications unrelated to the City's bankruptcy. Without waiver of such objection, UAW states it is unaware of any such notification as it relates to the City's bankruptcy.

Interrogatory No. 13: Please identify a lead person or persons who have knowledge of any communications undertaken by you or on your behalf with any unions, union members, retiree associations, retiree association members, or retirees related to the City of Detroit bankruptcy or the Plan.

Response to No. 13: Michael Nicholson, UAW General Counsel.

Interrogatory No. 14: Please identify a lead person or persons who have knowledge of documents created before January 1, 2013, referring to any property included in the Detroit Institute of Arts, or the value of any such property in any evaluation of the City of Detroit, the creditworthiness of the City of Detroit, or the ability of the City of Detroit to pay its debts.

Response to No. 14: UAW has no knowledge of any such documents.

Interrogatory No. 15: Please identify what individual(s) or entity(ies) is/are paying your attorneys' fees and expenses associated with the City of Detroit's bankruptcy.

Response to No. 15: UAW objects to Interrogatory #15 as seeking information not relevant to this proceeding. Nonetheless, UAW states that it is paying its own attorneys fees and expenses.

Interrogatory No. 16: Please identify all documents that you intend to use as exhibits, including demonstrative exhibits.

Response to No. 16: UAW has not decided what exhibits, if any, it intends to use.

Interrogatory No. 17: Please identify all fact witnesses who you will call.

Response to No. 17: UAW has not decided which fact witnesses, if any, it may call.

Interrogatory No. 18: Please identify all fact witnesses who you may call.

Response to No. 18: UAW has not decided which fact witnesses, if any, it may call.

Interrogatory No. 19: Please identify all experts whom you intend to call to testify and identify their area of expertise.

Response to No. 19: UAW has not decided which experts, if any, it may call to

testify or what area of expertise the experts may have.

May 6, 2014

International Union, UAW

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VERIFICATION

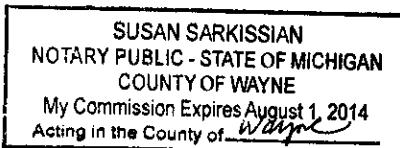
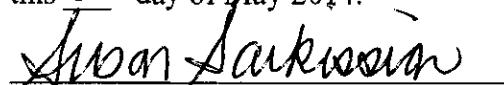
I declare under penalty of perjury that I have read the foregoing RESPONSES OF INTERNATIONAL UNION, UAW TO DEBTOR'S INTERROGATORIES and that, to the extent I have knowledge or information concerning the responses, the responses are true and correct to the best of my knowledge and belief.

Dated: May 5, 2014



Michael Nicholson
International Union, UAW
8000 E. Jefferson Ave.
Detroit, MI 48214

Subscribed and sworn to before me
this 5 th day of May 2014.



CERTIFICATE OF SERVICE

I certify that on this 6th day of May 2014, I caused the foregoing document to be served on counsel for Debtor and for all other parties of record through the Court's CM/ECF system.

/s/ Peter D. DeChiara
Peter D. DeChiara